

EXHIBIT A

Citizen's Motion for Summary Judgment			
	Honeywell's Proposal	Citizen's Proposal	Special Master Proposal¹
Parties to Reassess Potential for Mediation	As soon as possible	As soon as possible	
Oral Argument and Ruling on Citizen's Motion Re: Disputed Facts	October 2, 2008	October 2, 2008	October 2, 2008
Honeywell's Legal Brief (if necessary)	November 3, 2008	November 3, 2008	November 3, 2008
Citizen's Reply Brief (if necessary)	November 21, 2008	November 21, 2008	
Oral Argument and Ruling on Citizen's Motion (if necessary)	TBD	TBD	TBD

¹ A blank field in this column indicates that the entry was not part of the Special Master's proposal.

Proposed Schedule for Trial of Manufacturer Defendants

Pre-Markman Matters			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
Honeywell and Manufacturer Defendants to serve all outside counsel for customer defendants with confidential versions of their respective Markman papers, expert reports, expert deposition transcripts, and Markman demonstratives	Already done	September 16, 2008	
<p>Honeywell to serve all Customer Defendants with the following:</p> <p>(a) Honeywell's detailed infringement contentions (i.e., a limitation-by-limitation chart comparing the asserted claims against the accused products);</p> <p>(b) All discovery materials produced by Honeywell in this case (written responses and documents produced), all inventor deposition transcripts;</p> <p>(c) Detailed description as to why Honeywell believes each Customer Defendant having one or more licensed suppliers does</p>	<p>(a) Honeywell has agreed to provide its infringement contention responses produced during discovery to Manufacturer-Defendants.</p> <p>(b) Honeywell has already sent all of its <i>Markman</i>-related materials and validity expert discovery to the customer defendants. Additional materials are unnecessary to evaluating the claim construction record.</p> <p>(c) Such descriptions have already been provided as part of the meet-and-confer and informal process currently in place. In addition, part (c) is irrelevant to</p>	September 23, 2008	

Pre-Markman Matters			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
not have a license (or other ground for non-liability) due to the license.	claim construction.		
Opening Briefs Regarding Parties' Exchange of All Communications with Customer Defendants Regarding Accused Products (limited to 4 pages per August 13, 2008 Order)	September 18, 2008	September 26, 2008	September 26, 2008
Responsive Briefs re: same	September 25, 2008	October 10, 2008	October 10, 2008
Hearing on parties' exchange of all communications with customer defendants—decision at hearing	October 2, 2008	October 22, 2008	October 22, 2008
Hearing on Honeywell's pending motion for discovery regarding commercial success from Customer Defendants—decision at hearing	<p>Honeywell has proposed alternative procedures for alleviating the need to conduct commercial success discovery. <i>See</i> § II of Honeywell's Cover Letter.</p> <p>Hearing, if necessary, on October 2, 2009, and production of same to be consistent with Honeywell's production date (October 15, 2008)</p>	October 2, 2008	October 22, 2008
Hearing on FUJIFILM's pending motion to compel Honeywell's production of its teardown information on modules it found to infringe but omitted from the chart produced in response to	This event was not part of Special Master's Proposal. If heard, then October 2, 2008	October 2, 2008	

Pre-Markman Matters			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
Magistrate Judge Thygne's May 17, 2007 oral order (D.I. 848; 851) (contingent on grant of Honeywell's motion for commercial success discovery)			
Hearing on Manufacturer Defendants' request for Discovery from Honeywell regarding modules Honeywell dismantled but found not to infringe '371 patent (contingent on grant of Honeywell's motion for commercial success discovery)	This event was not part of Special Master's Proposal. If heard, then October 2, 2008	October 2, 2008	
Hearing on enforcement of Magistrate Thygne's Order of May 17, 2007 granting further deposition of Ted Wood re 50% hit rate (if necessary)	This event was not part of Special Master's Proposal. If heard, then October 2, 2008	October 2, 2008	
Hearing on Samsung SDI's pending motion to compel discovery previously withheld by Honeywell as common interest privilege	October 2, 2008	October 22, 2008	October 22, 2008
Discovery schedule regarding commercial success	TBD at October 2, 2008 hearing. <i>See</i> §§ II, IV, of Honeywell's Cover Letter.	TBD at October 2, 2008 hearing (if necessary, but no more than 45 days)	TBD at October 2, 2008 hearing
Honeywell to produce all communications with customer	October 15, 2008	October 15, 2008	October 15, 2008

Pre-<i>Markman</i> Matters			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
defendants regarding accused products, to the extent not already done			

Supplemental <i>Markman</i> Briefing and Final <i>Markman</i> Ruling			
	Honeywell's Proposal²	Defendants' Proposal	Special Master Proposal
Customer Defendants may request supplemental claim construction briefing regarding Preliminary <i>Markman</i> ruling; Customer Defendants must make showing of what discovery is needed not already of record	October 1, 2008	The latter of 7 days after final ruling on Customer Defendants Motions to Dismiss or 7 days after the Preliminary <i>Markman</i> ruling ³	The latter of 7 days after final ruling on Customer Defendants Motions to Dismiss or 7 days after the Preliminary <i>Markman</i> ruling.
Hearing on Customer Defendants' request for consideration of supplemental claim construction briefing and additional discovery related to claim construction – decision at hearing	October 2, 2008	The latter of 9 days after final ruling on Customer Defendants Motions to Dismiss or 9 days after Preliminary <i>Markman</i> ruling ⁴	The latter of 9 days after final ruling on Customer Defendants Motions to Dismiss or 9 days after Preliminary <i>Markman</i> ruling
Customer Defendants to conduct discovery regarding claim construction and filing of supplemental claim construction brief (same page limits as that for opening claim construction brief).	October 23, 2008	30 days from hearing on Customer Defendants' request for consideration of supplemental claim construction briefing	45 days from hearing on Customer Defendant's request for consideration of supplemental claim construction briefing
Honeywell to file opposition claim construction brief (same page limits as that for opposition claim construction brief).	November 4, 2008	10 days from Customer Defendants' supplemental claim construction brief	10 days from Customer Defendants supplemental claim construction brief
Final <i>Markman</i> Ruling	TBD by Judge Farnan	TBD by Judge Farnan	

² For the purpose of setting proposed dates, Honeywell's proposal assumes a Preliminary *Markman* Ruling date of September 29, 2008

³ All references to days are calendar days.

⁴ Defendants propose that the Preliminary *Markman* ruling automatically becomes the Final *Markman* ruling if (a) the Customer Defendants do not request supplemental claim construction briefing or (b) the Customer Defendant's request for supplemental claim construction briefing is denied. As stated at the hearing on September 4, 2008, depending upon the date that such contingencies become a reality, Honeywell submits that it may be necessary to set a reasonable date certain for the triggering of the expert phase.

Post-Final-Markman Matters			
Parties to supplement interrogatory responses, responses to requests for admission, and document requests	November 26, 2008	14 days after Judge Farnan's Final Markman ruling	14 days after Judge Farnan's Markman ruling
Parties to make election regarding willfulness, including opinions of counsel, and production thereof.	November 26, 2008	14 days after Judge Farnan's Final Markman ruling	

Expert Discovery			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
Parties to report to each other whether they will supplement their expert reports on invalidity and unenforceability	November 13, 2008 (limited to invalidity) ⁵ <i>See</i> §§ II, IV, of Honeywell's Cover Letter.	10 days after the latter of the final Markman Ruling or completion of discovery related to commercial success	10 days after the latter of the Final Markman Ruling or completion of discovery related to commercial success
Service of Reports on Which Each Party Has Burden	December 15, 2008 <i>See</i> §§ II, IV, of Honeywell's Cover Letter.	Expert Reports on issues where each party has the burden 30 days after the latter of the final Markman Ruling or completion of discovery related to commercial success	Expert reports on issues where each party has the burden 40 days after the latter of the Final Markman ruling or completion of discovery related to commercial success
Service of Expert Reports Responding to those where Each Party	January 20, 2009 <i>See</i> §§ II, IV, of Honeywell's Cover	Service of expert reports in response to opening reports 30 days after service of opening	Service of expert reports in response to opening reports 30 days after service of opening

⁵ Honeywell does not believe that there is any basis in the Court's pending *Markman* ruling to supplement unenforceability opinions, given that this defense is based upon claims not before the Court.

Expert Discovery			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
has Burden	Letter.	reports	reports
Conclusion of Expert Discovery	<p>February 10, 2009</p> <p>For infringement, depositions to last 4 hours per defendant. <i>E.g.</i>, Honeywell takes the Defendants' infringement experts for 4 hours for each defendant that an expert opines about. Defendants will take the corresponding amount of time with Honeywell's infringement experts.</p> <p>For damages, 4 hours per defendant on Defendant-specific issues, an additional joint 3.5 hours on common issues (<i>e.g.</i>, expert's understanding <i>Georgia Pacific</i> factors).</p> <p>For supplemental invalidity, depositions to be limited to 4 hours per expert.</p>	<p>21 days after responsive expert reports</p> <ul style="list-style-type: none"> Invalidity depositions limited to new opinions relating to Markman Ruling and commercial success discovery, and limited to 7.0 hours per expert; Infringement expert depositions limited to 4.0 hours, per expert, per party; and <p>Total deposition hours of Honeywell's damages expert: 3.5 hours plus 4 hours for each defendant participating in the deposition.</p>	<p>45 days after responsive reports</p> <ul style="list-style-type: none"> Invalidity depositions limited to new opinions relating to Markman Ruling and commercial success discovery, and limited to (___) hrs per expert; and Infringement and damages expert depositions limited to (___) hrs per expert

Case Dispositive Motions			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
Opening Briefs and Certifications	February 26, 2009 (on a Limited Number of Issues)	21 days after close of expert discovery	21 days after close of expert discovery

Case Dispositive Motions			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
Counter-Statements and Certifications	March 6, 2009	14 days after filing opening briefs	21 days after filing opening briefs
Responses to Counter-Statements	March 10, 2009	7 days after filing counter-statement	17 days after filing opening briefs
Special Master's Determination Whether Disputed Facts Exist	March 12, 2009	TBD	TBD
If Special Master decides that there are no factual disputes, then the parties shall file Responses to Case Dispositive motions	March 20, 2009	14 days after Special Master decides there are no material factual disputes	21 days after Special master decides there are no material factual disputes
Reply Briefs	March 26, 2009	10 days after Responses are filed	17 days after Responses are filed
Hearing on Case Dispositive Motions	April 1, 2009	TBD	TBD
Rulings on Case Dispositive Motions	April 8, 2009	TBD	TBD
Exceptions to Rulings on Case Dispositive Motions	April 13, 2009	10 days after the Rulings on the Dispositive Motions (including a determination that factual disputes exist)	14 days after the Rulings on the Case Dispositive motions (including a determination that factual disputes exist)
Replies to Exceptions to Rulings on Case Dispositive Motions	April 17, 2009	5 days after the Exceptions to Rulings	7 days after the Exceptions to Rulings

Motions in Limine and Trial-Readiness			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
Parties exchange Preliminary Versions of their parts of the Pretrial Order	May 7, 2009 <i>See § VI of Honeywell's Cover Letter.</i>	April 27, 2009	21 days after rulings on Case Dispositive motions
Parties exchange objections and supplementation to Preliminary Versions of the Pretrial Order	May 14, 2009	May 4, 2009	7 days after exchange of Preliminary Versions of Pretrial Orders
Parties Meet-and-Confer Regarding Pretrial Order issues	May 18, 2009	May 6, 2009	7 days after exchange of objections and supplementation to Preliminary Version of Pretrial Orders
Status Conference Regarding Remaining Schedule	May 21, 2009		To be determined by Judge Farnan
Motions in Limine/ <i>Daubert</i> Motions	June 4, 2009	May 15, 2009	14 days after Status Conference
Responses to Motions in Limine/ <i>Daubert</i> Motions	June 11, 2009	May 22, 2009	21 days after Status Conference
Hearings on Motions in Limine/ <i>Daubert</i> Motions	June 18, 2009	June 3, 2009	
Rulings on Motions in limine/ <i>Daubert</i> Motions	TBD	Provided on a rolling basis no later than June 12, 2009	
Exceptions to Rulings on Motions in limine/ <i>Daubert</i> Motions	TBD	On a rolling basis, no later than 3 days after the ruling comes in, but no later than June 15, 2009	
Responses to Exceptions to Rulings on Motions	TBD	On a rolling basis, three	

in limine/ <i>Daubert</i> Motions		days after the corresponding Exception, but no later than June 18, 2009	
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Pretrial Conference			
	Honeywell's Proposal	Defendants' Proposal	Special Master Proposal
Honeywell Provides its Parts of the Pretrial Order	June 25, 2009	June 8, 2009	56 days after final rulings on Case Dispositive motions
Defendants Provide their Parts of the Pretrial Order	July 1, 2009	June 15, 2009	18 days after Honeywell's parts of the Pretrial Order
Final Pretrial Order	July 8, 2009	June 22, 2009	16 days after service of Defendants parts of the Pretrial Order
Pretrial Conference	July 10, 2009	Week of June 29, 2009	
Commence Trial on all Issues Against all Manufacturer Defendants	July 13-30, 2009	July 13-30, 2009	July

InnoLux			
	Honeywell's Proposal	InnoLux's Proposal	Special Master Proposal
Deadline for Honeywell to Conclude Jurisdictional Discovery	November 26, 2008	November 26, 2008	September 30, 2008
InnoLux to Renew its Motion to Dismiss	November 28, 2008	November 28, 2008	October 1, 2008
Honeywell's Opposition to InnoLux's Renewed Motion to Dismiss	December 9, 2008	December 9, 2008	October 13, 2008
InnoLux's Reply	December 16, 2008	December 16, 2008	October 20, 2008
Hearing	December 19, 2008	December 16, 2008	October 22, 2008
Ruling	TBD	TBD	TBD

Substantive Fact Discovery	Completed by November 26, 2008	InnoLux Opposes	
Expert Discovery	Same Schedule as All Manufacturer Defendants		See Case Dispositive Motions and Trial above
Dispositive Briefing and Trial	Same Schedule as All Manufacturer Defendants		